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June 30, 1998

Rick Breitenbach
CALFED Bay/Delta Program
1416 Ninth Street, Suite 1155
Sacramento CA 95814

Dear Mr. Breitenbach:

On behalf of the 170,000 Sierra Club members in California, we submit the following comments on the CalFed Bay/Delta Program's DEIS/R.

The Sierra Club has been and hopes to remain a strong supporter of the success of the CalFed Bay/Delta Program. We commend your proposals to correct the devastating environmental destruction caused by decades of diversions, and to make amends for the physical structures built to enable those diversion. The ecosystem restoration plan, while needing certain improvements, holds great potential to restore the watershed and reverse the decline of endangered, threatened and candidate species.

However, the draft as currently written is fatally flawed in that much of its analysis is based on two underlying assumptions which, at best, are not established by the document and which, we believe, are not correct:

- 1) That there are no significant efficiencies (and therefore reduction in water needs) to be gained from water conservation, recycling and other demand side management measures.
- 2) That the No Action (and thus Baseline) alternative assumes the needs projections established in DWR's Bulletin 160-98. Bulletin 160-98 consistently overestimates the demand for water in California and underestimates the ability of water conservation to address demand.

Therefore, it is premature to consider new or expanded facilities - whether they be dams or canals - until demand assumptions are adjusted to reflect realistic projections. Simply put, decades of engineered tinkering with the system have led the Bay/Delta and its dependent species to the brink of destruction. Given that CalFed has failed to examine the data upon which the draft's projected demand is based, it is impossible to reach informed conclusions on issues such as conveyance and storage.

As a signatory to the letter submitted by the Environmental Water Caucus, we concur with the statements contained within that document. We would like to take this opportunity to highlight several important issues addressed within that letter:

NO DEMONSTRATED NEED FOR AN ISOLATED FACILITY

The Sierra Club finds no compelling evidence at this time to warrant construction of an isolated facility around the Delta. There is no certainty that an isolated facility would be the best solution for the two issues that have been cited as justification for such a facility - fisheries recovery and enhanced water quality.

- **Fisheries:** CalFed should work on changing the operation of the system, implement habitat restoration plans within the ecosystem, and study overall ecosystem needs before considering the relative value of an isolated facility to restore fish species. Fishery technicians who have been studying the merits of the three alternatives for fish are now saying that it is not at all clear that an isolated facility is the best solution for fish recovery. Some alternatives appear to have positive benefits for some species, while negatively impacting others. Fisheries biologists advise implementing such methods as stated above for 7-10 years. At that time we will be in a better position to make judgements about future needs.

- **Water quality:** Water quality scientists and advocates say that new treatment methods are coming on line which may reduce the cost of water treatment. In particular, better nonpoint source pollution control and enforcement of TMDL standards in the Delta address the problem more appropriately - at the source, rather than at the end of the pipe.

We should not repeat the past mistakes of heavy public investment in infrastructure that proves to be unsafe and unnecessary. We are now stuck with old nuclear power plants and their associated stranded costs. If an isolated facility is built for water quality and the intended beneficiaries find better and cheaper methods to achieve water quality goals, will the public then be liable for these stranded costs?

IMPLEMENT AGGRESSIVE WATER EFFICIENCY PROGRAMS BEFORE BUILDING NEW OR EXPANDING EXISTING DAMS

We wish to reiterate the Environmental Water Caucus statement that "the single most important thing that CalFed can do to promote efficiency is to refrain from....new subsidized water projects." Water users will have no incentive to invest in efficiency improvements as long as additional subsidized water is provided. As agriculture uses 80 percent of the developed water in California, even a 10 percent reduction - through proven technologies such as drip irrigation, properly timed water applications and other methods - could provide tremendous savings in California's water supply needs.

Overall agricultural water efficiency can be improved by combining affirmative regulation with incentives. Public control of public assets is our best assurance of a clean, safe environment - we have witnessed tremendous strides in air pollution reduction and energy conservation through state and federal regulatory and incentive processes. Surely water is such a public asset, worthy of public oversight and authority.

Furthermore, retiring some of the salinity-impacted lands on the west side of the San Joaquin

Valley would not only produce significant water gains which could and should be applied to environmental purposes, it would also enhance water quality by reducing the notorious toxic loading from these areas. However, such agricultural land retirement should not open the door to unrestrained and ill-planned sprawl development. Appropriate urban planning and restraints should be applied to minimize future growth impacts in these areas.

Additionally, CalFed should include an analysis of the storage and conveyance options under consideration as part of its DEIS/R, rather than merely referencing the 3-volume document which describes these choices. CalFed is not selecting any specific storage and conveyance option at this point in the process, yet it currently includes significant offstream storage in all three alternatives and an isolated facility in the third alternative. The public cannot properly evaluate CalFed's intentions without some discussion of possible outcomes and associated impacts of such options. At the very least, CalFed should provide a brief overview of each potential storage and conveyance option: project description, location, range of costs, and impacts to endangered, threatened and candidate species.

CALFED SHOULD EXPLORE OTHER WATER SUPPLY RELIABILITY METHODS - RECYCLING, CONJUNCTIVE USE AND APPROPRIATELY REGULATED TRANSFERS

In addition to implementing vigorous water conservation programs, particularly in the agricultural sector, a number of other methods that offer water supply reliability potential should be seriously examined:

- **Water Recycling:** CalFed has a terrific opportunity to take the lead in water recycling efforts and should pursue the development of a BMP that contains appropriate goals and objectives.
- **Conjunctive Use:** Appropriate management of groundwater basins can be a cheaper and more environmentally-beneficial means of obtaining water supply reliability. However, care should be taken to minimize negative environmental impacts, such as creating wetland recharge basins in areas that could potentially contain endangered or sensitive terrestrial species.
- **Water Transfers:** The development of new water for transfers cannot, in general, be justified unless the project will provide direct environmental benefits. The Sierra Club supports the voluntary transfer of water provided that certain conditions are met:
 - Transfers should take place within the context of environmental restoration.
 - Transfers which exacerbate existing long-term groundwater overdrafts or cause long-term overdrafts to occur should be prohibited.
 - Preference should be given to transfers in which impacts upon agricultural production, third parties, growth, and the environment are small or are beneficial. Environmental impacts must be mitigated, and transfers which cause significant negative environmental impacts should be prohibited.
 - Areas of origin must retain adequate water supplies for reasonable local needs.

- Agencies purchasing water should be implementing all justifiable water efficiency measures within their own districts.
- Transfers should not provide the basis for new urban sprawl.

USERS PAY FOR NEW FACILITIES

The Sierra Club shares the position of the Environmental Water Caucus that water users, not the public, should pay for the costs of all water supplies developed for their benefit. We heartily reject as absolutely ludicrous the notion that new or enlarged dams are "good for the environment." We absolutely oppose the expenditure of public monies for such facilities in the guise of environmental reparation.

We support public-private partnership funding for programs that ensure effective water conservation, including water recycling, or which provide scientifically-defensible ecosystem restoration benefits.

ASSURANCES ARE CRITICAL TO THE SUCCESS OF THE BAY/DELTA PROGRAM

Assuring a positive outcome is fundamental to the CalFed program. While the Sierra Club recognizes that absolute and perfect guarantees are not always possible in any given instance, CalFed's assurances package should strive to ensure a high level of confidence that program goals will be obtained. For example, an ecosystem restoration plan that lacks funding elements may well end up as a Paper Plan that is never implemented. In other words, we want actual species recovery, not just a "recovery plan." Thus, it is critical that assurances must be developed within each phase of all program elements and not addressed as a stand-alone topic. Assurances should be linked to established timelines, financial penalties for non-compliance.

ENDANGERED SPECIES RECOVERY SHOULD BE A TOP CALFED PRIORITY

CALFED's "ESA and CESA Compliance" paper outlines a future Conservation Strategy, but the Conservation Strategy itself was not available for public review with the draft EIS/R. Thus, the public and decision makers are given insufficient information about the substance of the proposal for ESA compliance.

CALFED proposes to use the Conservation Strategy in conjunction with the EIS/R as the Section 7 consultation required by the federal ESA. These two documents are intended to serve as a kind of programmatic biological opinion for the entire CALFED program. In addition, they will be used as the site-specific biological opinions for at least some projects from the common programs, some conveyance actions within the Delta, and "interim changes to operating procedures for water storage and conveyance." It is impossible to assess the sufficiency of the Conservation Strategy as a mechanism for authorizing incidental take without clear and specific information about the actions under review.

The draft proposes that the Conservation Strategy will serve as a "programmatic" biological opinion, presumably including a "programmatic" incidental take statement. In light of the massive scope of the CALFED program, it is neither practicable or appropriate to permit take of listed, or other

covered, species based solely on a programmatic level environmental review.

The draft lists various "assurances" that the Section 7 process would allow for in the CALFED process, and it states that a variety of these will be used. It is essential that the EIS/R specify what the agencies propose in the way of "assurances" for the federal agencies subject to the consultation requirements -- primarily the federal water development projects. We cannot agree that any firm assurances should be provided, given the substantial uncertainty surrounding how to achieve the species and ecosystem recovery at issue in the CALFED program.

The draft fails to discuss the nature of the "No Surprises" assurances that would be provided to the state or other non-federal parties who implement portions of the CALFED program pursuant to a federal HCP program. We recommend that the EIS/R be revised to disclose the agencies' intentions for incorporating the federal HCP process into the CALFED Program, and the relationship of this process to the larger assurances package and to ERPP implementation.

The draft suggests that the Conservation Strategy will contain its own recovery goals. We believe that the ERPP should serve as the action plan for species recovery --there should not be separate ecosystem recovery plans with distinct recovery objectives.

The EIS/R states that the Conservation Strategy will contain an adaptive management and monitoring program, and that this effort will supplement the adaptive management and monitoring programs being developed as part of the ERPP. We believe that the ERPP should function as a comprehensive recovery plan for covered species, and its monitoring program and adaptive management approach should be sufficiently broad to address endangered species recovery requirements.

GEOGRAPHIC SCOPE OF PROGRAM SOLUTION PLAN IS INCOMPLETE

CalFed should include the entire San Francisco Bay in the scope of its geographic problem, study and solution focus. The omission of a significant portion of the ecosystem from the scope of the CalFed's solution area has been challenged by leading biologists and others who work extensively on Bay/Delta issues.

Additionally, the Trinity River Basin should be included. Not only does this make sense from an ecological perspective, but the March, 1998 recommendation of the CalFed Ecosystem Roundtable include the Trinity as part of the solution area.

Restoration of flows and water purity to the San Joaquin River is absolutely essential to the CalFed program. It is impossible to have genuine restoration of the Bay/Delta ecosystem while leaving one of its main tributaries bone dry for a substantial portion of its run, and laden with agricultural poisons where it does contain "hydrological" properties. The recent federal appeals court that upholds the federal Endangered Species Act on Friant Dam water deliveries provides renewed hope for the San Joaquin. This significant decision should be factored into CalFed's plans for ecosystem recovery.

PUBLIC PARTICIPATION AND INVOLVEMENT SHOULD BE STRENGTHENED

Despite extensive stakeholder involvement and many public meetings, CalFed could nonetheless be characterized as an "insider process." The true stakeholders in the CalFed program extend far beyond the interest groups identified as "stakeholders" by CalFed. While CalFed has made some progress in the past few months, below are specific suggestions for improving CalFed's outreach and public involvement program.

- **Multicultural Outreach:** In order to truly engage communities of color and low-income communities, CalFed must go beyond distributing written materials and media releases and commit to: seek out and facilitate broad involvement by providing translators and funding to enable these groups to participate in CalFed; hold facilitated meetings with atmosphere and process of equal participation; co-sponsor outreach with community organizations; provide communities with information needed to participate (potential tradeoffs and impacts of the program on these specific communities).
- **Workgroups:** Given that moneyed interests have dominated CalFed (due to lack of resources, not interest, within the nonprofit community), CalFed should: submit the products of its workgroups to thorough independent review and additional public review; consider providing funds to enable nonprofit groups to participate and to hire their own consultants to help level the playing field.
- **Public Affairs:** CalFed's public affairs program could place a higher priority on ensuring California's citizens understand CalFed and its potential impacts, facilitate the public's input, and ensure it is considered (more "public participation" than "public relations").
- **Involvement in DPEIR/S:** Regarding CalFed's public involvement program for the DPEIR/S: the comment period was too short; the documents did not make the potential impacts and tradeoffs of different program elements clear enough; important information was buried or not included (e.g. information on estimated costs of the storage and conveyance facilities); location of the public hearings was not very accessible in some cities.

Ultimately, CalFed's success in involving the public will be its response to current public review and how well the next iteration of the DEIS/R incorporates the public's comments and suggestions.

DAM REMOVAL TO ENSURE FISH SURVIVAL SHOULD BE CONSIDERED

In addition to restoration of the upper San Joaquin River, removal of marginal dams could bring huge benefits to fisheries populations and should be explored. In particular, we support the removal of Englebright and Nimbus Dams, as well as certain Battle Creek dams. Other dams which no longer provide significant economic or other benefits should be studied for removal if such action could have positive impacts on endangered or anadromous fish.

The Sierra Club looks forward to CalFed's redraft of the DEIS/R. We urge CalFed to lead with a bold and evolutionary vision - to look ahead with solutions that will restore the ecosystem, provide safe, reliable water for legitimate uses, and maintain levee integrity where necessary. There is no silver bullet solution to these complex problems. Fixing the system will require a carefully regulated mix of water efficiencies, ecosystem restoration, recovery of endangered species and other measures.

CalFed has an unprecedented opportunity to lead our state into a sustainable water future - one that will benefit and protect our environment and economy - for our families and for our future.

Sincerely,

Dan Sullivan

Dan Sullivan
Chair, CalFed Task Force

Jackie McCort

Jackie McCort
Associate Field Representative

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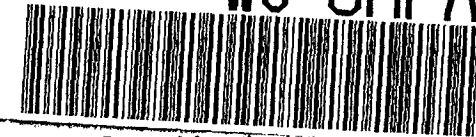
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